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*Attorney for Plaintiff Jane Doe*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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JANE DOE, an individual,

Plaintiff,

v.

NEVADAPURE, LLC, a Nevada limited  
liability company doing business under the  
fictitious firm name of SHANGO LAS  
VEGAS,

Defendant.

Case No. 2:19-cv-01664-JCM-VCF

**STIPULATION TO EXTEND TIME  
FOR PLAINTIFF TO RESPOND TO  
PARTIAL MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT [ECF No.  
10] AND MOTION TO COMPEL  
PLAINTIFF TO PROCEED  
WITH PROPER NAME [ECF No. 9]**

**(First Request)**

Plaintiff Jane Doe and Defendant NevadaPURE, LLC, by and through their respective counsel of record, stipulate and request that the Court extend the deadline for Plaintiff Jane Doe's response to NevadaPURE's Partial Motion to Dismiss Plaintiff's Complaint [ECF No. 10] and Motion to Compel Plaintiff to Proceed with Proper Name [ECF No. 9] from the current deadline of February 28, 2020, up to and including March 30, 2020. In support of this Stipulation to Extend, the parties state as follows:

1. Plaintiff Jane Doe was served with the Motion to Dismiss and Motion to Compel in this matter on February 14, 2020, rendering her response to the motions due by February 28, 2020.

2. Counsel for both parties have conferred regarding Plaintiff Jane Doe's request for an extension of time, and Defendant's counsel has indicated she has no objection to this request.

3. This request is being brought in good faith and is not sought for any improper purpose or other purpose of delay. The parties are engaging in settlement negotiations in this matter and the parties are requesting that Plaintiff's response deadlines be extended to allow for these discussions to occur.

WHEREFORE, the parties respectfully request that the Court extend the deadline for Plaintiff Jane Doe to respond to the motions, up to and including March 30, 2020.

DATED this 27th day of February, 2020.

Respectfully submitted,

MELANIE HILL LAW PLLC

/s/ Melanie Hill

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Respectfully submitted,

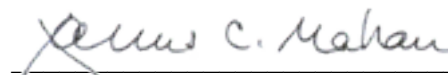
KAMER ZUCKER ABBOTT

/s/ Jen Sarafina

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IT IS SO ORDERED.

Dated March 2, 2020.



UNITED STATES DISTRICT COURT JUDGE